

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

MICHAEL BRIAN DUNKEL,
Defendant.

No. 1:13cr220

Consent Order of Forfeiture

WHEREAS, on May 23, 2013, Defendant Michael Brian Dunkel pled guilty to a single-count criminal information charging the defendant with Major Fraud against the United States, in violation of 18 U.S.C. § 1031, and pursuant to the defendant's plea, the defendant agreed to forfeit all of the defendant's interests in the property that is the subject of this order of forfeiture, to the entry of an order of forfeiture concerning such property, and that the conduct described in the Statement of Facts entered at the time of the defendant's plea provides a basis for the forfeiture of the property sought by the United States;

AND WHEREAS, the defendant agrees to waive the provisions of Federal Rules of Criminal Procedure 11(b)(1)(J), 32.2(a), 32.2(b)(4) and 43(a) with respect to discussion of forfeiture at the plea colloquy, notice of forfeiture in the charging instrument, and announcement of the forfeiture at sentencing and incorporation of the forfeiture in the judgment;

NOW, THEREFORE, IT IS HEREBY ORDERED ADJUDGED AND DECREED THAT:

1. The defendant forfeits to the United States the sum of \$2,960,697.37 in the form of a money judgment representing the proceeds of the criminal conduct the defendant admitted to

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having committed, pursuant to 18 U.S.C. §§ 981, 983, and 984; 28 U.S.C § 2461; and Fed. R. Crim. P. 32.2(b)(2).

2. This forfeiture order is final as to the defendant, pursuant to Fed. R. Crim. P. 32.2(b)(4)(A) and 18 U.S.C. § 983.

3. Upon the seizure of any property in partial satisfaction of the forfeiture money judgment imposed herein, the United States shall, to the extent practicable, provide direct written notice to any persons known to have alleged an interest in the seized property, and shall publish notice of this order in accordance with Fed. R. Crim. P. 32.2(b)(6).

4. The United States may move at any time, pursuant to Fed. R. Crim. P. 32.2(e), to amend this Consent Order of Forfeiture to forfeit substitute property to satisfy the money judgment in whole or in part.

Date: June 10, 2013
Alexandria, Virginia

/s/
Gerald Bruce Lee
United States District Judge

The Honorable Gerald Bruce Lee
United States District Court Judge

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WE ASK FOR THIS:

For the United States of America, plaintiff

Neil H. MacBride
United States Attorney


Jeffrey H. Knox
Chief, Fraud Section
Criminal Division, U.S. Department of Justice

By:


Chad I. Golder
Ryan S. Faulconer
Assistant United States Attorneys

For Michael Brian Dunkel, defendant


Michael Brian Dunkel
Defendant


J. Frederick Sinclair
Counsel for the Defendant